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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00155-JAM
11 Plaintiff,)
12 vs.) **STIPULATION AND ORDER TO CONTINUE**
13) **STATUS CONFERENCE AND EXCLUDE TIME**
14 JOSHUA WILSON and) Date: March 21, 2023
CODY CRAMER,) Time: 9:00 a.m.
15) Judge: Hon. John A. Mendez
Defendants.)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for
18 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
20 Cramer that the status hearing currently set for March 21, 2023 at 9:00 be continued to June 27,
21 2023 at 9:00 a.m.

22 The parties specifically stipulate as follows:

- 23 1. By previous order, this matter was set for a status on March 21, 2023 at 9:00 a.m.
24 2. By stipulation, Mr. Wilson now moves to continue the status conference to **June**
25 **27, 2023 at 9:00 a.m.**
26 3. To date, the government has produced approximately 850 pages and various
27 audio/video recordings of discovery to the defendants.
28

- 1 4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,
- 2 investigate and research possible defenses, research potential pretrial motions, and
- 3 explore potential resolutions to the case, and otherwise prepare for trial.
- 4 5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance
- 5 would deny them the reasonable time necessary for effective preparation, taking
- 6 into account the exercise of due diligence.
- 7 6. Neither the government nor Mr. Cramer object to the continuance.
- 8 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
- 9 Act), the parties request that the time period between March 21, 2023 and June
- 10 27, 2023, inclusive, be deemed excludable pursuant to 18 U.S.C. §
- 11 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
- 12 granted by the Court at the defense's request, based on a finding that the ends of
- 13 justice served by granting the continuance outweighs the best interest of the
- 14 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

15 Respectfully submitted,

16 HEATHER E. WILLIAMS
17 Federal Defender

18 Date: March 17, 2023

/s/ Hootan Baigmohammadi
 HOOTAN BAIGMOHAMMADI
 Assistant Federal Defender
 Attorneys for Mr. Wilson

21 Date: March 17, 2023

/s/ Kyle Knapp
 Kyle Knapp
 Attorney for Mr. Cramer

24 Date: March 17, 2023

 PHILLIP A. TALBERT
 United States Attorney

26 /s/ James R. Conolly
27 James R. Conolly
 Assistant United States Attorney
28 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: March 17, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE